

PD

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF PENNSYLVANIA
Philadelphia, DIVISION

JAMES T. COLE, JR.

REG. NO. 41167-066

(Enter above the full name
of the plaintiff or plaintiffs in
this action)

vs.

Case No: 18 3668
(To be supplied by the Clerk of this Court)

Rodney "Frog" Carson

T.M.G. Publishing Firm,

Amazon Inc and/or Corp.

(Enter above the full name of ALL
defendants in this action. Do not
use "et al.")

CHECK ONE ONLY:

COMPLAINT UNDER THE CIVIL RIGHTS ACT, TITLE 42 SECTION 1983
U.S. Code (state, county, or municipal defendants)

COMPLAINT UNDER THE CONSTITUTION ("BIVENS" ACTION), TITLE
28 SECTION 1331(a) U.S. Code (federal defendants)

OTHER (cite statute, if known) **Diversity of Citizenship 28 USC §1332**

**BEFORE FILLING OUT THIS COMPLAINT, PLEASE REFER TO "INSTRUCTIONS FOR
FILING." FOLLOW THESE INSTRUCTIONS CAREFULLY.**

I. Plaintiff(s):

- A. Name: James T. Cole, Jr Reg No. 41167-066
- B. List all aliases: n/a
- C. Prisoner identification number: Reg No. 41167-066
- D. Place of present confinement: U.S.P. Atlanta
- E. Address: P.O. Box 150160 Atlanta, Ga. 30315

(If there is more than one plaintiff, then each plaintiff must list his or her name, aliases, I.D. number, and current address according to the above format on a separate sheet of paper.)

II. Defendant(s):

(In A below, place the full name of the first defendant in the first blank, his or her official position in the second blank, and his or her place of employment in the third blank. Space for two additional defendants is provided in B and C.)

- A. Defendant: Rodney "Frog" Carson
Title: Author of "Fall Of The J.B.M."
Place of Employment: Federal Witness Program(Unknown) U.S. Marshal'
- B. Defendant: T.M.G. Publishing Firm ,
Title: Publisher Of "Fall Of The J.B.M."
Place of Employment: 122 W. 34th St. New York, NY. 10120
- C. Defendant: Amazon Corporation
Title: Distribution Of "Fall Of The J.B.M."
Place of Employment: 410 Terry Ave. N. Seattle, WA. 98109

(If you have more than three defendants, then all additional defendants must be listed according to the above format on a separate sheet of paper.)

III. Exhaustion of Administrative Remedies

You are required to exhaust all your available administrative remedies before bringing an action in federal court.

A. Is there a grievance procedure available at your institution?

YES () NO (x) If there is no grievance procedure, skip to F. n/a

B. Have you filed a grievance concerning the facts in this complaint?

YES () NO ()

C. If your answer is YES:

1. What steps did you take?

2. What was the result?

3. If the grievance was not resolved to your satisfaction, did you appeal?

What was the result (if there was no procedure for appeal, so state.)

D. If your answer is NO, explain why not:

E. Is the grievance procedure now completed? YES () NO ()

F. If there is no grievance procedure in the institution, did you complain to authorities? YES (xx) NO ()

G. If your answer is YES:

1. What steps did you take?

n/a

2. What was the result?

n/a

H. If your answer is NO, explain why not:

IV. List ALL lawsuits you (and your co-plaintiffs, if any) have filed in any state or federal court

A. Name of case and docket number: Cole vs- Ferranti, 4:10-cv-00426

B. Approximate date of filing lawsuit: March/2010

C. List all plaintiffs (if you had co-plaintiffs), including any aliases:
Seth Ferranti(author)
Gorilla Publishing

D. List all defendants: see above

E. Court in which the lawsuit was filed (if federal court, name the district; if state court, name the county): M.D. Pennsylvania

F. Name of judge to whom case was assigned: Judge Smyer/Jones

"Diversity"

G. Basic claim made: Divisity Of Citizenship (Controversy)
Book "Street Legends" Defamation Claim

H. Disposition of this case (for example: Was the case dismissed? Was it appealed? Is it still pending?): Loss Third Circuit Court Of Appeals
(CA3) 532 Fed Appx 205 (3rd Cir 2013).

H. Approximate date of disposition: 2013)

IF YOU HAVE FILED MORE THAN ONE LAWSUIT, THEN YOU MUST DESCRIBE THE ADDITIONAL LAWSUITS ON ANOTHER PIECE OF PAPER, USING THIS SAME FORMAT. REGARDLESS OF HOW MANY CASES YOU HAVE PREVIOUSLY FILED, YOU WILL NOT BE EXCUSED FROM FILLING OUT THIS SECTION COMPLETELY, AND FAILURE TO DO SO MAY RESULT IN DISMISSAL OF YOUR CASE. CO-PLAINTIFFS MUST ALSO LIST ALL CASES THEY HAVE FILED.

V. Statement of Claim:

State here as briefly as possible the facts of your case. Describe precisely how each defendant is involved. Include also the names of other persons involved, dates, and places. **Do not give any legal arguments or cite any cases or statutes.** If you intend to allege a number of related claims, number and set forth each claim in a separate paragraph. (Use as much space as you need. Attach extra sheets if necessary.)

The fact of the matter, I was convicted in E.D. Pennsylvania
a couple of decades ago of being a member of a corrupt organization
known as the Junior Black Mafia(JBM). However, I was convicted based
upon lies, lies and lies not the truth. Now the defendant, "Rodney Carson
alleges that he is writing a non-friction book abot his lies. There is
no truth to his book. He should not profit from lies. And he knows it.
Rodney Carson wants to deflame my Charater. The other defendant are just
doing a public servant and T.M.G. Publishing, as well as Amazon Distribution.

Another factor, I still have pending litigation available in federal
Court in the EASTERN District Of Pennsylvania and that will give Mr Carson
a technical advantage if a trial become see, U.S.vs- Cole, 2:14-cv-02987-
28 USC §2255, denied however the appeal (was a interlogutory appeal).

CA NO (S-164)

(1) He Mr Carson was paid \$4,000 by the gov't for his testimony as lease that is whta we thought. He hid that his family was paid over \$200,000 dollars in a three(3) time frame, another reason to lie on Cole.

He, Mr Carson went to a grand jury lying that we, **Carson, Davis, Aaron Jones** was all in a meeting discussing drug prices. However at my trial, he Mr Carson testified to something completely different. He now allges to a jury. he only saw Cole as he was comming to Mr Jones Mother house, This was used in his closing arguments to boast his credibility which he has none. Mr Carson never knew Cole and never heard of Cole.

I did not deserve a life sentence on **Lies**. They used his testimony at my sentencing to make me a organizer of the JBM.

This Mr Carson is a bad dude and now he wants money, on lies and I am in the processing of forming a substantial question for this court, to determine whether a known lier. can make a **non-friction book** and their is documentation, demostrating tthe auther is lying what legal endevor should the court take in a case like that?????????????????????????

VI. Relief:

State briefly exactly what you want the court to do for you. Make no legal arguments. Cite no cases or statutes.

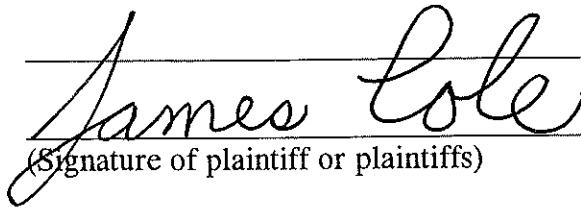
I want the court to put a "injunction" on the book until the
the outcome of all litigation, with regards to the name **Junior Black**
mafia is termination and/or hold an evidentiary hearing on the Matter,
because lives are involve and this is not a Joke.

a. Carson pay, \$ 1,000,000 (2) T. M.G pay \$ 1,000,000
(3) AMAZON, pay \$ 1,000,000 each defendant
or trial by JURY.

CERTIFICATION

By signing this Complaint, I certify that the facts stated in this Complaint are true to the best of my knowledge, information and belief. I understand that if this certification is not correct, I may be subject to sanctions by the Court.

Signed this 23th day of August, 2018.


(Signature of plaintiff or plaintiffs)

James T. Cole Jr.

(Print name)

28 USC 1746

(I.D. Number)

Reg No 41167-066

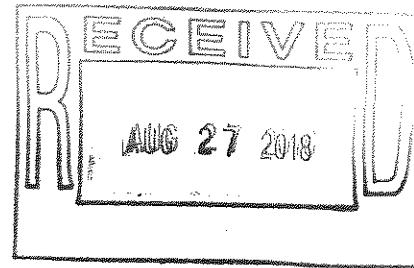
P.O. Box 150160

Atlanta, Ga. 30315

(Address)

August 23, 2018

James T.Cole, Jr
Reg No,41167-066
FCI Atlanta
P.O. Box 150160
Atlanta, Ga. 30315



Clerk
U.S. Courts
E.D. Pennsylvania
601 Market Sts
Phila. Pa. 19106

**Re: Deflamation Of Charater
[Divirsity Of Citizenship]**

Dear Clerk

I cannot fine the other firm you sent so will the enclosed one do. I will be looking for it and if find I will submit and if this will not do, sent anothe firm.

The defendant, from Street Sources book is comming out in October/2018. The street are talking .

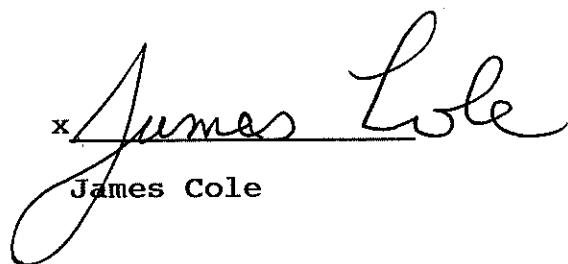

x James Cole
James Cole

Exhibit in support

1 IN THE UNITED STATES DISTRICT COURT
2 FOR THE EASTERN DISTRICT OF PENNSYLVANIA
3 -----
4

5 UNITED STATES OF AMERICA,)
6)
7)
8)
9)
10)
11)
12)
13)
14)
15)
16)
17)
18)
19)
20)
21)
22)
23)
24)
25)

TRANSCRIPT OF PROCEEDINGS

of sentence hearing held in the above-entitled
action on Tuesday, March 10, 1993 by the
Honorable Marvin Katz, District Judge.

12 APPEARANCES:
13

14)
15)
16)
17)
18)
19)
20)
21)
22)
23)
24)
25)

For the Government:

U. S. Attorney's Office
615 Chestnut Street, Suite 1250
Philadelphia, Pa. 19106-1797
By: Allison Burroughs, Esq., AUSA
Joel Friedman, Esq., AUSA
Abigail Simkus, Esq., AUSA

For the Defendant:

Robert Marano, Esq.
Suite 450, The Curtis Center
Philadelphia, Pa. 19106

Also present: Joel Rosen, Esq., Assistant District
Attorney

Florence Jones
Official Reporter
Proceedings recorded by mechanical stenography, transcript
produced by computer-aided transcription.

1 charged.

2 Your Honor, at the time of Rodney Carson came in
3 almost right from the beginning, virtually right in the
4 beginning he gave detailed information about members of
5 the JBM.

6 It would not be an overstatement to say that
7 Rodney Carson dealt only the JBM organization. He'd been
8 with the organization a long time through the Spring of
9 1991 when he withdrew from the organization. He provided
10 detailed information about the membership and meetings,
11 the acts of violence, the drug dealing of the organization
12 from late 1985 straight through up to 1991.

13 Although Rodney Carson was a member of this
14 organization for a very long time and disclosed a good
15 deal of information about JBM-related violence, he never
16 participated in any of the JBM-related violence although
17 he was present at meetings where those things were
18 arranged.

19 During the course of his cooperation, Your
20 Honor, he testified in the ^{three} two JBM trials before Your
21 Honor which I'm sure Your Honor recalls. He was prepared
22 to testify in the third trial as well although that
23 ultimately proved unnecessary.

24 In addition to those two testimonies, he was
25 prepared to testify a third time. He also appeared before



U.S. Department of Justice
United States Attorney
Eastern District of Pennsylvania

615 Chestnut Street
Suite 1250
Philadelphia, Pennsylvania 19106-4476
(215) 451-5200

June 3, 1993

Bob Marano
923-413-
[Handwritten signature]

The Curtis Center
Suite 450
Independence
July 1993
[Handwritten signature]

Doreen Bennett
Security Specialist
Office of Enforcement Operations
P.O. Box 7600
Ben Franklin Station
Washington, D.C. 20044-7600

Dear Ms. Bennett:

I am writing as per our recent conference call, which involved you, me and Special Agent Jesse Coleman of the Federal Bureau of Investigation, and concerned Rodney Carson.

I believe, and Special Agent Coleman concurs, that Rodney Carson will need additional services from the Witness Protection Program following his release from custody. His current federal release date is June 8, 1993. As you know, his federal and state plea agreements intended that his state and federal sentences run concurrently and coterminously. It is my understanding that the state court judge was going to sign an order yesterday afternoon, which would allow the state sentence to terminate at the same time as the federal sentence. I will advise you by phone once I have confirmed that the order was signed.

During our conversation yesterday afternoon, we discussed Rodney Carson and statements that he allegedly made during a psychological examination concerning past violent conduct. Jesse Coleman also spoke with Rodney Carson following our conference call. Rodney Carson was a member of a very violent drug trafficking organization in Philadelphia. This group primarily relied on the use of firearms to achieve their violent ends and further their drug business. Throughout his affiliation with this drug trafficking organization, Carson remained relatively removed from the violence perpetrated by the organization, by which I mean [Handwritten arrow pointing right]

At the

LIE
II

that he never killed anyone, nor directed that anyone else kill someone. Special Agent Coleman confirmed with Carson that he had never ordered a contract killing. If information to the contrary is included in Carson's psychological examination, it reflects a misperception between Rodney and the examiner. ↙

Call/
Pm
by
Art
NAME.

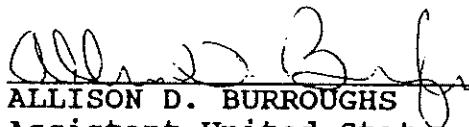
When Special Agent Coleman and I represented in our threat and risk assessments that Carson had not engaged in violent conduct, we were referring to JBM related murders and the use of firearms. We are aware that Rodney participated in a prison aggravated assault, ↙ at the direction of JBM leader Aaron Jones, and that this assault resulted in the victim being rendered unconscious for a brief period. Carson pled guilty to his role in this offense as part of his state plea agreement. To our knowledge, no permanent harm was done to the victim, nor was he ever in a coma. Carson also engaged in fist fights which was a routine part of his life in Philadelphia as a gang member.

Again, to reiterate, Special Agent Coleman and I do not believe that Carson would pose a significant risk of danger to the community should he be released from prison and continue his participation in the Program.

Thank you for time and attention to this matter. Please let me know if I can provide you with any further information.

Sincerely yours,

JOEL M. FRIEDMAN
Assistant United States Attorney
Chief, Organized Crime Division


ALLISON D. BURROUGHS
Assistant United States Attorney



by Rodney Carson

HIGHLIGHTS & MURKERS

COLMBEAN (VICTIM): WILLIAM "QUIET STORM" PERDUE (SHOOTER), SHAWN "SHAY" WALL (PARTNER), LOCATION 55TH VENGESES ST. BETWEEN CHESTER AVE. AND SPRINGFIELD AVE. ORDERED BY LEROY DAVIS, REASON: DISRESPECT, STEALING. SKUG DEAD. TERRY CARSON WAS THE INTENDED PERSON.

ARTHUR WILEY (COOS) & ~~PA~~ VICTIM: JAMES "JIMMY MAC" HENDERSON. AFTER NUMEROUS ATTEMPTS BY STANLEY "SKUG" HAYES, WILLIAM "QUIET STORM" PERDUE LOCATION - CHEETA PARKS APARTMENT #8215 LINDBERGH BLVD. REASON: STEALING.

DEAN

~~SKUG~~ RODNEY "LAST NAME UNKNOWN" (VICTIM): WILLIAM "QUIET STORM" PERDUE, JAMES "MONT" ALEXANDER, DEREK "Bolo" ALLEN, AND SEVERAL OTHERS, REASON: RUG COMPETITOR, LOCATION 38TH GREENWAY AVE. PALACEENS.

NAVIN HENRY "BIG DAVE" (VICTIM): AARON JONES, DONALD MASON, MELVIN BROOKS, RENAISS FRIENDS AND OTHERS, REASON: RUG COMPETITOR, LOCATION 49TH RAYS FERRY AVE. GAS STATION (ATMACO). SURVIVED.

NAVIN HENRY (VICTIM): DEREK "Bolo" ALLEN, WILLIAM PERDUE. ~~SOLHILL COAST~~ 58TH GREENWAY AVE. SURVIVED

MELVIN "BLACK MEL" BROOKS (VICTIM): STANLEY HAYES. REASON: STOLE MONEY. LOCATION: 60TH CHESTER AVE. ORDERED BY LEROY DAVIS.

ANNEAE "CLINT" (VICTIM): STANLEY HAYES, DEREK ~~SKUG~~ "Q" STEPFLIGHT: KICKING AT SLOAN ANDERSON LOCATION: 57TH GREENWAY AVE. SURVIVED.

5. JUNE 11 CAISONE BARBERSHOP 845 - WILLIAM PERDUE, JAMES ALEX NAWALEK KILLED, THE SHOOTERS WERE WILLIAM PERDUE & JAMES ALEXANDER WHO SHOT BROKEN. LOCATION 68TH KIRKLAND SURVIVED.

Rodney Carson



EFAN HENRY (VICTIM): Greg (Shooter), Rodney Carson (Killed). AFTER
EIGHT UNSUCCESSFUL ATTEMPTS BY ME AND MELVIN DAVIS, THE ARKANSAS CITY POLICE "CLASSIFIED" REASON: BECAUSE HIS BROTHER DAVIS STABBED KEVIN BROWN
IN HOLMES BLDG. ARKANSAS. LOCATION: IN FRONT OF HIS HOUSE ON CECIL ST.
TRENTON 58^{1/2} CHEERWICH AVE AND 68^{1/2} COMMUNIST ORDER BY AARON JONES
YAN THOMAS. SOLICITED.

his own admission involved
hits + murders
(prosecutor knew)

Prosecution Memorandum

Anthony Fletcher by people believed by the JBM to be associated with Craig Haynes, AARON JONES called a meeting of a number of JBM members. JONES stated that he had a source who would tell him when Haynes was at a particular location in South Philadelphia. He further stated that he was going to use Dirty Black (CHRISTOPHER LASTER) and WILL PERDUE to kill Haynes. JONES then ordered LASTER and PERDUE to go to 24th and Moore to kill Haynes. LASTER and PERDUE returned later and stated that Haynes had not been at 24th and Moore, but they started shooting anyway and they knew that they had killed somebody (victim determined by police to be Willie BOWMAN - shot 7/11/89).

AARON JONES and BRYAN THORNTON discussed in CARSON's presence the fact that they along with SAM BROWN had shot and attempted to kill Richard Isaacs because he had refused to buy his drugs from the JBM.

During the fall of 1989, at the direction of AARON JONES, CARSON and DIRTY BLACK (CHRISTOPHER LASTER) go to the vicinity of 28th and Cecil Streets for the purpose of shooting Stefan Henry. Henry did not appear that night and thus was not shot on this occasion. (prosecutor knew Carson involved in murders)

2. Dwight Sutton

In 1987 for approximately one month he operated a crack house for AARON JONES and LEONARD PATTERSON. On some occasions Sutton would obtain the crack capsules from PATTERSON and transport them to the house from which he would sell them or supervise their sale. Sutton made eight trips to Florida on behalf of the JBM to purchase and transport cocaine back to Philadelphia. While in Florida on one of those trips in June of 1987, AARON JONES travelled to Florida to resolve a problem that had arisen involving the drug money. On various occasions he would hear discussions about drug business between AARON JONES, LEONARD PATTERSON, KEVIN BOWMAN, REGINALD REEVES and SAM BROWN. Usually, upon returning from Florida, Sutton would deliver the cocaine to AARON JONES, LEONARD PATTERSON, KEVIN BOWMAN, JAMES PRICE and SAM BROWN.

3. Andre Crews

Knows JONES to be the head of the JBM, and has heard him give orders to members. In the summer of 1988, Crews attended a meeting with AARON JONES, BERNARD FIELDS, and SAM BROWN. They attempted to persuade him to buy cocaine from them by offering to front it, and by offering it at a better price than he was then paying. Subsequent to this meeting, Crews got word on the street that if he didn't start buying from the JBM, he would be hurt. He was then contacted by BERNARD FIELDS and told to attend a second meeting. The second meeting was attended by AARON JONES, BERNARD FIELDS, REGINALD REEVES, BRYAN THORNTON,

REPORT OF INVESTIGATION

Page 1 of 3

PROGRAM CODE	2. CROSS FILE	RELATED FILES	3. FILE NO.	4. G-DEP IDENTIFIER
BY: S/A Charles Allen AT: Philadelphia FD	<input type="checkbox"/>	SCP-90-0004	CK-89-Z004	FN2-C1
	<input type="checkbox"/>	CK-88-Z005	5. FILE TITLE	Aaron JONES
7. <input checked="" type="checkbox"/> Closed <input type="checkbox"/> Requested Action Completed <input type="checkbox"/> Action Requested By:	<input type="checkbox"/>		6. DATE PREPARED	January 22, 1990
8. OTHER OFFICERS: S/A James Fitzgerald, Trp. Bruce Peachey Delaware State PD, Ofc. Dan Daley New Castle PD and Ofc. William Sullivan Wilmington PD				
10. REPORT RE: INITIAL DEBRIEFING SCP-90-0004				

DRUG RELATED INFORMATION:

1. On 01/16/90, at approximately 11:30 AM, S/A Charles Allen debriefed SCP-90-0004 at a prearranged location in the greater Philadelphia area relative to the drug trafficking activities of known and suspected JBM members in and around Wilmington Delaware.
2. SCP-90-0004 stated that he/she knew reputed JBM members Rodney CARSON (aka "FROG"), Derrick STEPLIGHT (aka "Q"), Melvin DAVIS (aka "MEL") and Leroy DAVIS (aka "BUCKY"). SCP-90-0004 says that his/her association with these individuals began in 1987 when he/she served in the Navy with Rodney CARSON. According to SCP-90-0004, CARSON was being discharged from the service at this time for narcotics violations. He (CARSON) told SCP-90-0004, "when you get out, look me up." *He testified he was AWOI*
3. SCP-90-0004 stated that on his/her release from the NAVY (also in 1987), he/she took to hanging out with CARSON at a house located on Creighton Street in West Philadelphia which is said to belong to Leroy DAVIS. SCP-90-0004 described the location as a cut house and drug distribution point, Leroy DAVIS is said to have favored this house as a place to relax. SCP-90-0004 says that a short time after he/she began frequenting Creighton Street, he/she also became a small time narcotics (cocaine) trafficker, buying and selling ounce quantities. SCP-90-0004 further stated that he/she would purchase the cocaine from Bucky DAVIS at \$700 per ounce eventually working his/her way up to 10 (ten) ounce transactions.
4. SCP-90-0004 says that between them, Rodney CARSON and Wilt PERDUE (aka "STORM") were moving approximately 2 (two) kilograms of cocaine a week out of Creighton Street. SCP-90-0004 estimated that BUCKY would have been moving (selling) at least twice that amount. SCP-90-0004 says that BUCKY currently utilizes Melvin DAVIS as a house sitter in his absence.

11. DISTRIBUTION: REGION DISTRICT OTHER AMRI, DIO, OCD	12. SIGNATURE (Agent) Special Agent Charles Allen 14. APPROVED (Name and Title) Acting G/S Martin Pracht	13. DATE 2/5/90 15. DATE 2/5/90
---	---	--

DEA Form - 6
(Rev. 1980)DEA SENSITIVE
DEA ENFORCEMENT ADMINISTRATIONThis report is the property of the Drug Enforcement Administration.
Neither it nor its contents may be disseminated outside the agency to which loaned.

Previous edition may be used.

REPORT OF INVESTIGATION
(Continuation)

CK-89-7004

EN2-C1

3. FILE TITLE

Aaron JONES

Page of

2 . 3

PROGRAM CODE

6. DATE PREPARED

January 22, 1990

5. SCP-90-0004 says that the Elsmire Skating Rink in Wilmington, Delaware was a major hangout spot for all young (20-30 YOA) area hustlers on Sundays until it was recently closed for renovations. SCP-90-0004 says that this crowd has relocated to the Franklinville New Jersey Skating Rink since the close. SCP-90-0004 describes Will PERDUE and the aforementioned individuals from paragraph #2 as regulars.

6. SCP-90-0004 says that Bucky DAVIS, Rodney CARSON and Will PERDUE are seeking to expand their narcotics operation into Wilmington. They have been persistant (per SCP-90-0004) in their efforts to get SCP-90-0004 to lease an apartment for them so that they can have a proper shop or base of operations. SCP-90-0004 says that he/she presently has them on hold.

7. SCP-90-0004 says that he/she can make a buy from Rodney CARSON and that the introduction of a undercover for that purpose should be fairly easy. SCP-90-0004 feels that a transaction of less than \$5000 would probably be turned down by CARSON, SCP-90-0004 also feels that in the initial phases of the deal, Melvin DAVIS would act as a go between. Per SCP-90-0004 ounces are now selling for between \$950 and \$1200.00.

8. SCP-90-0004 says that he/she frequently sees Alfonzo CALDWELL driving Rodney CARSON's car (white later modeled 740 Volvo 740 State Wagon). CALDWELL (aka "FONNY") figures prominently in the Frank SAUNDER's investigation which at present is centered in Chester, PA, he is a millionaire and has been in the narcotics trade since the age of 14. SCP-90-0004 says that he/she saw Will PERDUE riding in the car with CALDWELL last week.

NON-DRUG RELATED INFORMATION:

1. SCP-90-0004 stated that Terrance GOSS aka "PAPERS" was shot at Rodney CARSON's instigation. GOSS, who was a member of the CRAIG HAYNES DRUG TRAFFICKING ORGANIZATION was shot nine times in front of Cahoots Disco (Airport Hilton, Phila.) which resulted in an execution attempt on Leroy DAVIS aka BUCKY the next day by members of HAYNE's faction. This took place circa February 2 and 3, 1989.

2. SCP-90-0004 further stated May 1989 Willie CHASE was found shot to death along with three other Philadelphia area males. Bodies of the four were found shot execution style in a later model Volvo somewhere in Virginia (?). Per SCP-90-0004 this was a JBM sanctioned hit because one of these individuals had made a flagrant show of not paying back drug money owed to Leroy DAVIS and Rodney CARSON.

MONEY LAUNDERING:

1. None to report.

MS BORROWS
had information

1
2 UNITED STATES DISTRICT COURT
3 FOR THE EASTERN DISTRICT OF PENNSYLVANIA
4 - - -
5

6 BEFORE THE FEDERAL GRAND JURY
7
8

9 Stenographic transcript of
10 proceeding and evidence presented before the
11 Federal Grand Jury of the United States District
12 Court for the Eastern District of Pennsylvania,
13 601 Market Street, Room 4716, Independence Mall
14 West, Philadelphia, Pennsylvania, 19106 on
15 Wednesday, March 13, 1991, commencing at 2:13
16 p.m., before Joanne D. Jardiniano, Court
17 Reporter-Notary Public there being present.
18
19

20 TESTIMONY OF: RODNEY CARSON
21
22

23 PRESENT:
24
25

26 ALLISON BURROUGHS, ESQUIRE
27 and
28 ARNOLD GORDON, ESQUIRE
29 Assistant United States Attorneys
30
31
32
33
34
35
36
37
38
39
40
41
42
43
44
45
46
47
48
49
50
51
52
53
54
55
56
57
58
59
60
61
62
63
64
65
66
67
68
69
70
71
72
73
74
75
76
77
78
79
80
81
82
83
84
85
86
87
88
89
90
91
92
93
94
95
96
97
98
99
100
101
102
103
104
105
106
107
108
109
110
111
112
113
114
115
116
117
118
119
120
121
122
123
124
125
126
127
128
129
130
131
132
133
134
135
136
137
138
139
140
141
142
143
144
145
146
147
148
149
150
151
152
153
154
155
156
157
158
159
160
161
162
163
164
165
166
167
168
169
170
171
172
173
174
175
176
177
178
179
180
181
182
183
184
185
186
187
188
189
190
191
192
193
194
195
196
197
198
199
200
201
202
203
204
205
206
207
208
209
210
211
212
213
214
215
216
217
218
219
220
221
222
223
224
225
226
227
228
229
230
231
232
233
234
235
236
237
238
239
240
241
242
243
244
245
246
247
248
249
250
251
252
253
254
255
256
257
258
259
260
261
262
263
264
265
266
267
268
269
270
271
272
273
274
275
276
277
278
279
280
281
282
283
284
285
286
287
288
289
290
291
292
293
294
295
296
297
298
299
300
301
302
303
304
305
306
307
308
309
310
311
312
313
314
315
316
317
318
319
320
321
322
323
324
325
326
327
328
329
330
331
332
333
334
335
336
337
338
339
340
341
342
343
344
345
346
347
348
349
350
351
352
353
354
355
356
357
358
359
360
361
362
363
364
365
366
367
368
369
370
371
372
373
374
375
376
377
378
379
380
381
382
383
384
385
386
387
388
389
390
391
392
393
394
395
396
397
398
399
400
401
402
403
404
405
406
407
408
409
410
411
412
413
414
415
416
417
418
419
420
421
422
423
424
425
426
427
428
429
430
431
432
433
434
435
436
437
438
439
440
441
442
443
444
445
446
447
448
449
450
451
452
453
454
455
456
457
458
459
460
461
462
463
464
465
466
467
468
469
470
471
472
473
474
475
476
477
478
479
480
481
482
483
484
485
486
487
488
489
490
491
492
493
494
495
496
497
498
499
500
501
502
503
504
505
506
507
508
509
510
511
512
513
514
515
516
517
518
519
520
521
522
523
524
525
526
527
528
529
530
531
532
533
534
535
536
537
538
539
540
541
542
543
544
545
546
547
548
549
550
551
552
553
554
555
556
557
558
559
550
551
552
553
554
555
556
557
558
559
560
561
562
563
564
565
566
567
568
569
560
561
562
563
564
565
566
567
568
569
570
571
572
573
574
575
576
577
578
579
580
581
582
583
584
585
586
587
588
589
580
581
582
583
584
585
586
587
588
589
590
591
592
593
594
595
596
597
598
599
590
591
592
593
594
595
596
597
598
599
600
601
602
603
604
605
606
607
608
609
600
601
602
603
604
605
606
607
608
609
610
611
612
613
614
615
616
617
618
619
610
611
612
613
614
615
616
617
618
619
620
621
622
623
624
625
626
627
628
629
620
621
622
623
624
625
626
627
628
629
630
631
632
633
634
635
636
637
638
639
630
631
632
633
634
635
636
637
638
639
640
641
642
643
644
645
646
647
648
649
640
641
642
643
644
645
646
647
648
649
650
651
652
653
654
655
656
657
658
659
650
651
652
653
654
655
656
657
658
659
660
661
662
663
664
665
666
667
668
669
660
661
662
663
664
665
666
667
668
669
670
671
672
673
674
675
676
677
678
679
670
671
672
673
674
675
676
677
678
679
680
681
682
683
684
685
686
687
688
689
680
681
682
683
684
685
686
687
688
689
690
691
692
693
694
695
696
697
698
699
690
691
692
693
694
695
696
697
698
699
700
701
702
703
704
705
706
707
708
709
700
701
702
703
704
705
706
707
708
709
710
711
712
713
714
715
716
717
718
719
710
711
712
713
714
715
716
717
718
719
720
721
722
723
724
725
726
727
728
729
720
721
722
723
724
725
726
727
728
729
730
731
732
733
734
735
736
737
738
739
730
731
732
733
734
735
736
737
738
739
740
741
742
743
744
745
746
747
748
749
740
741
742
743
744
745
746
747
748
749
750
751
752
753
754
755
756
757
758
759
750
751
752
753
754
755
756
757
758
759
760
761
762
763
764
765
766
767
768
769
760
761
762
763
764
765
766
767
768
769
770
771
772
773
774
775
776
777
778
779
770
771
772
773
774
775
776
777
778
779
780
781
782
783
784
785
786
787
788
789
780
781
782
783
784
785
786
787
788
789
790
791
792
793
794
795
796
797
798
799
790
791
792
793
794
795
796
797
798
799
800
801
802
803
804
805
806
807
808
809
800
801
802
803
804
805
806
807
808
809
810
811
812
813
814
815
816
817
818
819
810
811
812
813
814
815
816
817
818
819
820
821
822
823
824
825
826
827
828
829
820
821
822
823
824
825
826
827
828
829
830
831
832
833
834
835
836
837
838
839
830
831
832
833
834
835
836
837
838
839
840
841
842
843
844
845
846
847
848
849
840
841
842
843
844
845
846
847
848
849
850
851
852
853
854
855
856
857
858
859
850
851
852
853
854
855
856
857
858
859
860
861
862
863
864
865
866
867
868
869
860
861
862
863
864
865
866
867
868
869
870
871
872
873
874
875
876
877
878
879
870
871
872
873
874
875
876
877
878
879
880
881
882
883
884
885
886
887
888
889
880
881
882
883
884
885
886
887
888
889
890
891
892
893
894
895
896
897
898
899
890
891
892
893
894
895
896
897
898
899
900
901
902
903
904
905
906
907
908
909
900
901
902
903
904
905
906
907
908
909
910
911
912
913
914
915
916
917
918
919
910
911
912
913
914
915
916
917
918
919
920
921
922
923
924
925
926
927
928
929
920
921
922
923
924
925
926
927
928
929
930
931
932
933
934
935
936
937
938
939
930
931
932
933
934
935
936
937
938
939
940
941
942
943
944
945
946
947
948
949
940
941
942
943
944
945
946
947
948
949
950
951
952
953
954
955
956
957
958
959
950
951
952
953
954
955
956
957
958
959
960
961
962
963
964
965
966
967
968
969
960
961
962
963
964
965
966
967
968
969
970
971
972
973
974
975
976
977
978
979
970
971
972
973
974
975
976
977
978
979
980
981
982
983
984
985
986
987
988
989
980
981
982
983
984
985
986
987
988
989
990
991
992
993
994
995
996
997
998
999
990
991
992
993
994
995
996
997
998
999
1000
1001
1002
1003
1004
1005
1006
1007
1008
1009
1000
1001
1002
1003
1004
1005
1006
1007
1008
1009
1010
1011
1012
1013
1014
1015
1016
1017
1018
1019
1010
1011
1012
1013
1014
1015
1016
1017
1018
1019
1020
1021
1022
1023
1024
1025
1026
1027
1028
1029
1020
1021
1022
1023
1024
1025
1026
1027
1028
1029
1030
1031
1032
1033
1034
1035
1036
1037
1038
1039
1030
1031
1032
1033
1034
1035
1036
1037
1038
1039
1040
1041
1042
1043
1044
1045
1046
1047
1048
1049
1040
1041
1042
1043
1044
1045
1046
1047
1048
1049
1050
1051
1052
1053
1054
1055
1056
1057
1058
1059
1050
1051
1052
1053
1054
1055
1056
1057
1058
1059
1060
1061
1062
1063
1064
1065
1066
1067
1068
1069
1060
1061
1062
1063
1064
1065
1066
1067
1068
1069
1070
1071
1072
1073
1074
1075
1076
1077
1078
1079
1070
1071
1072
1073
1074
1075
1076
1077
1078
1079
1080
1081
1082
1083
1084
1085
1086
1087
1088
1089
1080
1081
1082
1083
1084
1085
1086
1087
1088
1089
1090
1091
1092
1093
1094
1095
1096
1097
1098
1099
1090
1091
1092
1093
1094
1095
1096
1097
1098
1099
1100
1101
1102
1103
1104
1105
1106
1107
1108
1109
1100
1101
1102
1103
1104
1105
1106
1107
1108
1109
1110
1111
1112
1113
1114
1115
1116
1117
1118
1119
1110
1111
1112
1113
1114
1115
1116
1117
1118
1119
1120
1121
1122
1123
1124
1125
1126
1127
1128
1129
1120
1121
1122
1123
1124
1125
1126
1127
1128
1129
1130
1131
1132
1133
1134
1135
1136
1137
1138
1139
1130
1131
1132
1133
1134
1135
1136
1137
1138
1139
1140
1141
1142
1143
1144
1145
1146
1147
1148
1149
1140
1141
1142
1143
1144
1145
1146
1147
1148
1149
1150
1151
1152
1153
1154
1155
1156
1157
1158
1159
1150
1151
1152
1153
1154
1155
1156
1157
1158
1159
1160
1161
1162
1163
1164
1165
1166
1167
1168
1169
1160
1161
1162
1163
1164
1165
1166
1167
1168
1169
1170
1171
1172
1173
1174
1175
1176
1177
1178
1179
1170
1171
1172
1173
1174
1175
1176
1177
1178
1179
1180
1181
1182
1183
1184
1185
1186
1187
1188
1189
1180
1181
1182
1183
1184
1185
1186
1187
1188
1189
1190
1191
1192
1193
1194
1195
1196
1197
1198
1199
1190
1191
1192
1193
1194
1195
1196
1197
1198
1199
1200
1201
1202
1203
1204
1205
1206
1207
1208
1209
1200
1201
1202
1203
1204
1205
1206
1207
1208
1209
1210
1211
1212
1213
1214
1215
1216
1217
1218
1219
1210
1211
1212
1213
1214
1215
1216
1217
1218
1219
1220
1221
1222
1223
1224
1225
1226
1227
1228
1229
1220
1221
1222
1223
1224
1225
1226
1227
1228
1229
1230
1231
1232
1233
1234
1235
1236
1237
1238
1239
1230
1231
1232
1233
1234
1235
1236
1237
1238
1239
1240
1241
1242
1243
1244
1245
1246
1247
1248
1249
1240
1241
1242
1243
1244
1245
1246
1247
1248
1249
1250
1251
1252
1253
1254
1255
1256
1257
1258
1259
1250
1251
1252
1253
1254
1255
1256
1257
1258
1259
1260
1261
1262
1263
1264
1265
1266
1267
1268
1269
1260
1261
1262
1263
1264
1265
1266
1267
1268
1269
1270
1271
1272
1273
1274
1275
1276
1277
1278
1279
1270
1271
1272
1273
1274
1275
1276
1277
1278
1279
1280
1281
1282
1283
1284
1285
1286
1287
1288
1289
1280
1281
1282
1283
1284
1285
1286
1287
1288
1289
1290
1291
1292
1293
1294
1295
1296
1297
1298
1299
1290
1291
1292
1293
1294
1295
1296
1297
1298
1299
1300
1301
1302
1303
1304
1305
1306
1307
1308
1309
1300
1301
1302
1303
1304
1305
1306
1307
1308
1309
1310
1311
1312
1313
1314
1315
1316
1317
1318
1319
1310
1311
1312
13

1 Q. And was Sam Brown a member of the JBM?

2 A. Yes, he is.

Q. In 1986, did you and Bucky have a meeting with [redacted] at a house in West Philadelphia? C.C.E. "Organizer"

6 A. Yes, we did.

Q. In addition to you and Bucky and Aaron Jones, was [James Cole] also at this meeting?

9 A. Yes. " Rehearsed B.S.

10 Q. Was the purpose of this meeting for Bucky
11 Davis to tell Aaron Jones that Sam Brown was
12 charging the two of you too much for the cocaine
13 you were getting from him?

14 A. Yes.

15 Q. Was Aaron Jones upset about the fact that
16 Sam Brown or "Magic" was charging you so much?

17 A. Yes, he was.

18 Q. Beginning a couple of months after this
19 meeting at approximately the end of 1986 or the
20 beginning of 1987, did you and Bucky begin getting
21 your cocaine directly through Aaron Jones?

22 A. Yes.

23 Q. When you wanted cocaine would you or Bucky
24 call Aaron Jones and tell him that you wanted to
25 see him?



Carson - Direct

1 meaning, Leroy Davis, we should not be charged that high a
 2 price we being family and he didn't want to go down from the
 3 price that he was giving the cocaine to us for so we took the
 4 conversation to someone higher than them in the organization to
 5 Aaron Jones and we met with Aaron Jones pertaining to that.

6 Q Who was at that meeting with Aaron Jones? See Grand Jury!

7 A It was me, Leroy Davis and Aaron Jones. testified, Cole!

8 Q Where did that meeting take place?

9 A Aaron Jones's mother's house. Said a house/no specific G.J.

10 Q What was decided at the meeting?

11 A It was decided that we would start receiving the cocaine
 12 directly from Aaron Jones.

13 Q Did someone arrive at Aaron's mother's house during or
 14 right after that meeting? ???

15 A Yes. the fact

"Rehearsed"

16 Q Who was that?

" "

Abby or 17 A James Cole. Lie! See G.J., he said Cole at meeting!

PICKING COLE IN THE CONSPIRACY,
 AND ORGANIZER.

18 Q What happened after Cole arrived?

19 A Well, upon them pulling up to the house, Aaron recognized
more than one, who?
 20 him pulling up to the house. He informed us that James is here
 21 to meet with -- to meet with me, meaning Aaron, about him
 22 wanting us to cool out because things are getting too hot as
 23 far as our drug business. Things is moving too fast and
 24 getting too hot for the organization.

25 Q After this meeting with Aaron how would you and Bucky get

Said James NICKNAME was FAT BOY!

Do not know Cole.

J.C.

early

1988

1 and he sees Goldie, Goldie at the mall, Goldie, the other
2 person in 125-I, Goldie, the person whose house was searched in
3 January of 1988, Goldie who is supposed to get the 14 kilograms
4 from James Price. He sees Goldie and Goldie tells him Aaron
5 wants to get in touch with him and so forth and Aaron then says
6 he's unhappy with James Cole. James Cole is pulling all kind
7 of sneaky shit and, in fact, Aaron says he paid James Cole all
8 the money. Earl says I'm short on the money. I haven't been
9 paid all of it and Aaron says he paid him all the money so we
10 go -- There's a discussion with Goldie. Goldie sets up a
11 meeting with Aaron and then they meet with Aaron.

12 Now after that there are 100, 150 and 200 and 30
13 kilograms of cocaine delivered.

14 What does Frog, Rodney Carson, have to say? He says
15 when he first joined that James Cole was the leader and
16 distributor and that Aaron Jones was getting his cocaine from
17 James Cole.

18 He said that Aaron Jones and James Cole delivered to
19 others in addition to Rodney Carson, others who had different
20 areas of the city: Sam brown, Basil, that's Leonard Patterson,
21 Kevin Bowman, Bernard Fields, Reggie Reaves and that they were
22 selling cocaine just as Bucky Davis and Frog were selling
23 cocaine.

24 On one occasion Leroy Davis, Frog, Rodney Carson, and
25 Aaron Jones were having a meeting. James Cole arrived but they

1 didn't meet with James Cole.

2 Ladies and gentlemen of the jury, assuming that ~~✓~~
3 Rodney Carson was not telling the truth, wouldn't it have been
4 much easier for him to have said: Oh, yes, we all had a meeting
5 together; James Cole was there, Aaron Jones was there; we had a
6 big discussion.

7 *Putting Cole in the conspiracy!*
8 No, ladies and gentlemen of the jury, he testified
9 they weren't there at the meeting but according to Aaron Jones,
10 he said that Cole was there to meet because he was upset, he
11 wanted people to cool things off. There was too much heat
12 coming down on the JBM and the chairman of the board, the
13 insulated fellow, James Cole, the supplier, the connect, the
14 guy that was above that didn't want to expose himself to being
15 caught, the smart guy; he wanted people to cool it because he
16 didn't want all this heat down. He didn't want to get caught
17 but, ladies and gentlemen of the jury, I submit this
18 prosecution shows that he was caught.

19 Now also there's testimony that there was a later
20 meeting in early 1988, a meeting at Fayette Street and the
21 members of the JBM were there and Aaron Jones said that James
22 Cole wanted to cool it.¹ He was going to go out to California
23 and he wanted to cool it and basically James Cole was not going
24 to be there any more as the connect.^{B5}

25 Now Carson also testified that in 1990, James Cole
26 returned and at that point in time "Q", Bernard Fields, one of

Early
1988

89
Rebuttal Allison Burroughs

1 Rodney Carson, Dave Baynham all the others when he assumed
2 leadership of the drug trafficking organization known as the
3 Junior Black Mafia or the JBM.

4 Although some of our witnesses are not the most
5 upstanding citizens and you may in fact consider them to be the
6 offensive immoral people I believe that's how Mr. Trigiani
7 referred to them we haven't made any bones about that ladies
8 and gentlemen. We are not attempting to put these people
9 forward as the people we would most like to have at our house
10 or your house for dinner but these people do have at least two
11 things going for them when you evaluate their credibility. /

12 The first thing is that they made a commitment to }
13 tell the truth when they signed their plea agreements or
14 accepted their immunity. And the second is that so much of
15 what each witness said was corroborated by what other witnesses
16 said or by the recorded conversations or by the physical
17 evidence like the guns seized from James Cole.
 ↓

18 Let's talk about motivation to tell the truth and I
19 want to read a couple paragraphs from the plea agreement. The
20 one I'm going to read from is Rodney Carson. I'm going to
21 paraphrase Paragraph 4 is Government Exhibit 2. (Read).

22 Paragraph 17. (Read).

23 Paragraph 18. (Read).

24 Similarly ladies and gentlemen, each of the immunity
25 agreements that you heard about in this case I have Marco

Burroughs/rebuttal

90

1 Lopez's in my hand this also provides if a witness doesn't
 2 testify truthfully the Government has the right to use whatever
 3 it is they said against them in a later criminal proceeding and
 4 that includes prosecuting them for all the crimes for which
 5 they received immunity in this agreement and there's also a
 6 paragraph in this agreement virtually the same agreement as in
 7 Rodney Carson's Paragraph 6. (Read).

8 Well, we all know ladies and gentlemen that to a
 9 certain extent people generally and the people that testified
 10 as witnesses in this case are often motivated by their own
 11 self-interests. What the provisions in the immunity agreement
 12 do is give each and every cooperating witness a powerful
 13 personal incentive to tell the truth because they know if they
 14 don't tell the truth it's then they can be prosecuted not only
 15 for whatever role they may have played but also for perjury or
 16 for any other crimes they may have told the Government about
 17 during the course of their cooperation.

18 Can you trust these people to tell the truth the
 19 question Mr. Trigiani asked you. Well, we are not asking you
 20 to unconditionally accept the uncorroborated testimony of any
 21 witness. You may by rightfully skeptical about finding that
 22 the word of anyone of these people would be sufficient to
 23 establish guilt beyond a reasonable doubt but in this case you
 24 heard the testimony of numerous witnesses and what they said
 25 was corroborated the testimony of each other and that testimony

Rebuttal

1 doesn't make you guilty of anything.

2 Once again in Mr. Trigiani's closing you heard about
 3 the organizational charts prepared by Rodney Carson and Chris
 4 Anderson. Some what surprising to hear about those charts
 5 again since the witnesses explained so clearly why Cole didn't
 6 appear but to reiterate Rodney Carson told you his particular
 7 chart reflected a particular moment in time 1988-1989 and if
 8 you look at that chart which I believe the defendant marked as
 9 an exhibit you'll see it includes individuals that became a
 10 part of the JBM during that get down lay down thing people that
 11 became involved with the organization after James Cole stepped
 12 back because he thought the thing was getting too high profile.

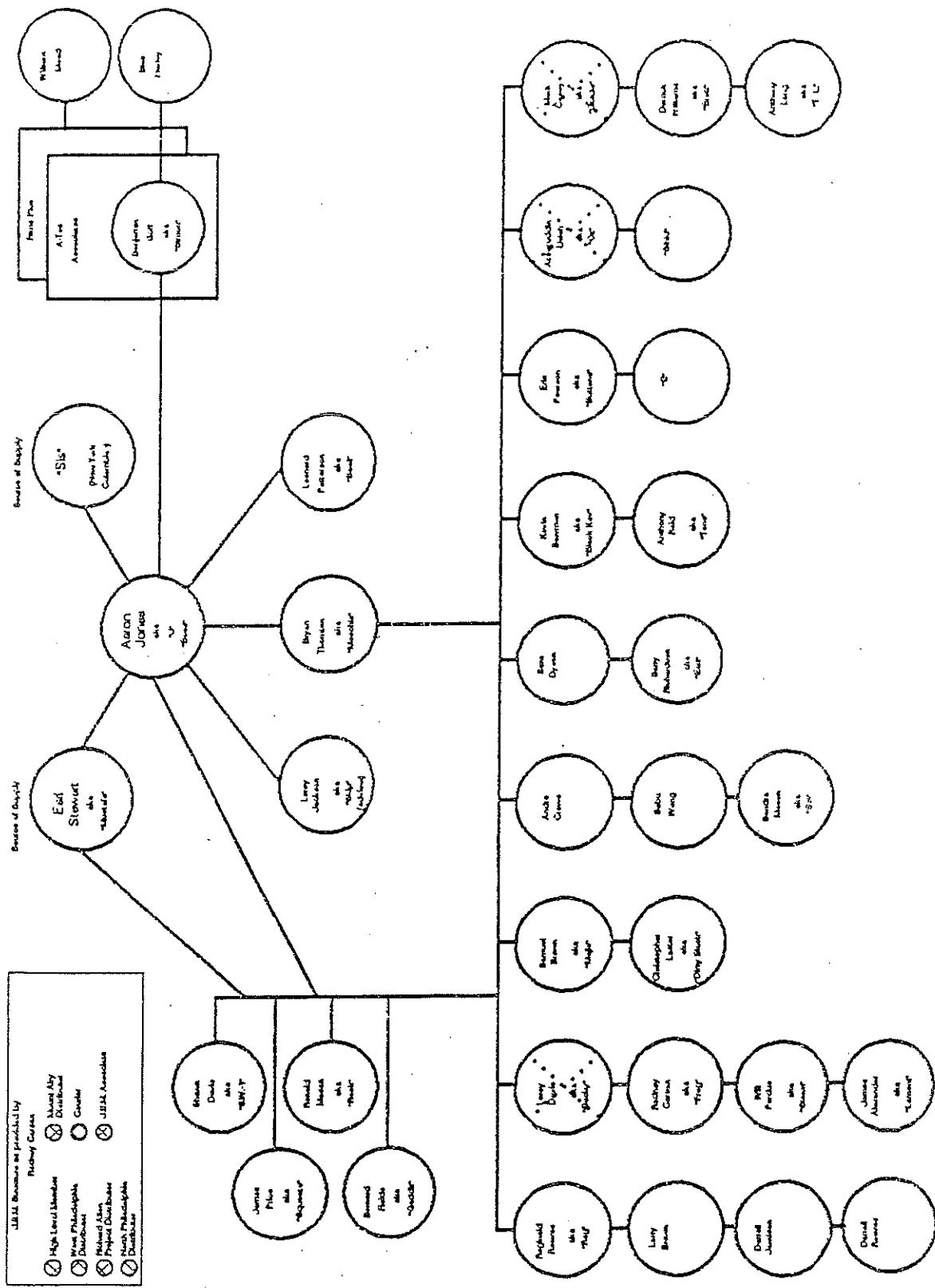
13 Likewise Chris Anderson told you his chart was made
 14 in preparation for a prior proceeding that did not involve
 15 James Cole prepared during the time that Cole was a fugitive.
 16 Now ladies and gentlemen, James Cole is not a stupid
 17 man. In fact I submit to you that the evidence in this case
 18 showed that he was rather clever. He backed away from the JBM
 19 when it got too high profile backed away when ~~_____~~ ~~_____~~
 20 started with the get down and lay down campaign when ~~_____~~
 21 ~~_____~~ got the rings with the initials JBM started appearing on
 22 cars. //

23 You also heard from Marco Lopez about how James was
 24 so paranoid this meeting in the hotel took place in a hotel
 25 bathroom. That testimony by Lopez was corroborated by one of

Aaron Jones,

Index 10
you, exhibit.

Cheif witness
Rodney Curson



July 6, 2018

James Cole
Reg No. 41167-066
FCI Atlanta
P.O. Box 150160
Atlanta, Ga. 30315

Clerk
U.S. Courthouse
615 Market Sts.
Phila. Pa. 19106

Re: Restrain/Injunction
Relief].

Dear Clerk

Would you please hand this one up. I cannot be sure however I want to bring this to your attention, because I believed that this moght be a related case, in the matter of **Aaron Jones v. Commonwealth**, Case [unknown], in front of **Honorable Savage** where Mr Jones has pending litigation.

This is for your information.

Thanks in this matter.

x James Cole
James Cole